

Message Text

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PAGE 01 OSLO 02947 150912Z
ACTION EUR-12

INFO OCT-01 ISO-00 SOE-02 AID-05 CEA-01 CIAE-00
COME-00 DODE-00 EB-08 DOE-15 H-01 INR-10 INT-05
L-03 NSAE-00 NSC-05 OMB-01 PM-05 ICA-11 OES-07
SP-02 SS-15 STR-07 TRSE-00 ACDA-12 OPIC-03 /131 W
-----069406 160211Z /73

R 150842Z JUN 78
FM AMEMBASSY OSLO
TO SECSTATE WASHDC 6010
INFO AMEMBASSY PARIS

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DEPARTMENT PASS TREASURY FOR ROSENBLUM (INTERNATIONAL TAX COUNSEL)

PARIS FOR USOECD

E.O. 11652: N/A
TAGS: EFIN, NO
SUBJECT: NORWEGIAN PETROLEUM TAX

REF: PARIS 18821

1. WE UNDERSTAND THAT GON FINANCE MINISTER KLEPPE MET WITH
SECRETARY BLUMENTHAL JUNE 14 TO IN EFFECT SEEK ASSURANCES THAT
RECENT US QUOTE POSTED PRICE UNQUOTE TAX RULINGS DO NOT CALL INTO
QUESTION THE NORWEGIAN ASSUMPTION THAT THEIR QUOTE SPECIAL TAX
UNQUOTE ON PETROLEUM IS IN NO SUBSTANTIAL WAY INCONSISTENT WITH THE
US/NORWEGIAN DOUBLE TAXATION TREATY. DEEPLY INVOLVED IN THE FOURTH
ROUND OF OFFSHORE NORTH SEA OIL TRACT LICENSING NEGOTIATIONS, THE
GON, ACCORDING TO FINANCE MINISTRY SOURCES, HAS BECOME ALARMED
ABOUT US OIL COMPANIES' CONTENTIONS THAT SUGGEST THE NORWEGIAN
PETROLEUM TAX STRUCTURE MAY BE AFFECTED BY THE NEW USG TAX RULINGS
AND THE GON HAS DECIDED TO ASK FOR ASSURANCES AT THE POLITICAL
LEVEL TO REFLECT THE VERY HIGH IMPORTANCE THEY ATTACH TO THIS
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ISSUE.

2. THE FOURTH ROUND LICENSING NEGOTIATIONS ARE EXPECTED
TO CONTINUE THROUGH JULY, BUT HAVING RECOGNIZED THE ISSUE
AS UNDECIDED THE GON NOW NEEDS AN ANSWER FROM THE US AS EARLY
AS POSSIBLE. (AN ADDED INCENTIVE FROM THE GON VIEWPOINT IS
THE CONCERN THAT US COMPANIES MAY REQUEST A RULING ON THE

ISSUE AND THAT SUCH REQUESTS WOULD NOT ADEQUATELY REFLECT GON
THINKING.)

3. WE ARE POUCHING ADDITIONAL COPIES OF THE FRYDENLUND/
VANCE LETTER AND KLEPPE AIDE-MEMOIRE TO TREASURY (ROSENBLOOM)
AND EUR/NE (GOODMAN).
BREMER

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NNNN

Message Attributes

Automatic Decaptioning: X
Capture Date: 01 jan 1994
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: PETROLEUM, TAXES, MINISTERIAL MEETINGS
Control Number: n/a
Copy: SINGLE
Draft Date: 15 jun 1978
Decaption Date: 01 jan 1960
Decaption Note:
Disposition Action: RELEASED
Disposition Approved on Date:
Disposition Case Number: n/a
Disposition Comment: 25 YEAR REVIEW
Disposition Date: 20 Mar 2014
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1978OSLO02947
Document Source: CORE
Document Unique ID: 00
Drafter: n/a
Enclosure: n/a
Executive Order: N/A
Errors: N/A
Expiration:
Film Number: D780346-1195
Format: TEL
From: OSLO
Handling Restrictions: n/a
Image Path:
ISecure: 1
Legacy Key: link1978/newtext/t19780653/aaaabttu.tel
Line Count: 69
Litigation Code IDs:
Litigation Codes:
Litigation History:
Locator: TEXT ON-LINE, ON MICROFILM
Message ID: 3f39e287-c288-dd11-92da-001cc4696bcc
Office: ACTION EUR
Original Classification: LIMITED OFFICIAL USE
Original Handling Restrictions: n/a
Original Previous Classification: n/a
Original Previous Handling Restrictions: n/a
Page Count: 2
Previous Channel Indicators: n/a
Previous Classification: LIMITED OFFICIAL USE
Previous Handling Restrictions: n/a
Reference: 78 PARIS 18821
Retention: 0
Review Action: RELEASED, APPROVED
Review Content Flags:
Review Date: 05 may 2005
Review Event:
Review Exemptions: n/a
Review Media Identifier:
Review Release Date: N/A
Review Release Event: n/a
Review Transfer Date:
Review Withdrawn Fields: n/a
SAS ID: 2330734
Secure: OPEN
Status: NATIVE
Subject: NORWEGIAN PETROLEUM TAX
TAGS: EFIN, NO
To: STATE
Type: TE
vdkgvwkey: odhc://SAS/SAS.dbo.SAS_Docs/3f39e287-c288-dd11-92da-001cc4696bcc
Review Markings:
Sheryl P. Walter
Declassified/Released
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